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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Luis QUINONEZ-Lagarda
AKA: Antonio AGUILERA-Sanchez

Defendant.

Magistrate Case No. '08 MJ 07 07

COMPLAINT FOR VIOLATION OF

Title 8, U.S.C., Section 1324(a)(2)(B)(iii)-
Bringing in Illegal Alien(s)
Without Presentation

The undersigned complainant being duly sworn states:

On or about **March 4, 2008**, within the Southern District of California, defendant, **Luis QUINONEZ-Lagarda AKA: Antonio AGUILERA-Sanchez** with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that aliens, namely, **Jose de Jesus SOLANO-Contreras, Monica RAMIREZ-Rosales and Rocio Aide CARRILLO-Ramirez**, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said aliens, and upon arrival did not bring and present said aliens immediately to an appropriate immigration officer at a designated port of entry; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(iii).

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.

SIGNATURE OF COMPLAINANT
Sara Esparagoza, United States Customs
and Border Protection Enforcement Officer

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS **6TH** DAY OF **MARCH**, 2008.

UNITED STATES MAGISTRATE JUDGE
CATHY ANN BENCIVENGO
U.S. MAGISTRATE JUDGE

PROBABLE CAUSE STATEMENT

The complainant states that **Jose de Jesus SOLANO-Contreras, Monica RAMIREZ-Rosales and Rocio Aide CARRILLO-Ramirez** are citizens of a country other than the United States; that said aliens have admitted they are deportable; that their testimony is material, that it is impracticable to secure their attendance at the trial thereof by subpoena; and they are material witnesses in relation to this criminal charge and should be held or admitted to bail as prescribed in Title 18, United States Code, Section 3144.

On March 4, 2008 at about 1712 hours **Luis QUINONEZ-Lagarda (Defendant)** applied for admission to the United States from Mexico through the San Ysidro Port of Entry. Defendant was the driver and sole visible occupant of a silver 2002 BMW 525i. Defendant presented a Permanent Resident Card (I-551) bearing the name Fernando Ortega Sanchez as proof of admissibility to a Customs and Border Protection (CBP) Officer and gave a negative Customs declaration. Defendant also claimed ownership of the vehicle. The CBP Officer requested the vehicle's registration and noticed that the name was not Fernando Ortega Sanchez. The CBP Officer also noticed that the license plate on the registration did not match the license plate on the vehicle. The CBP Officer suspected Defendant was an imposter to the document presented. Defendant and the vehicle were subsequently escorted to secondary for further inspection.

In secondary, Defendant was determined to be an imposter to the document presented and a citizen of Mexico with no documents to enter or reside in the United States. Also in secondary, CBP Officers discovered four concealed individuals in the trunk of the vehicle. The four concealed individuals were determined to be citizens of Mexico without documents to enter or reside in the United States. Three of the four were retained as Material Witnesses and are now identified as: **Jose de Jesus SOLANO-Contreras (MW1), Monica RAMIREZ-Rosales (MW2) and Rocio Aide CARRILLO-Ramirez (MW3)**

During a videotaped proceeding, Defendant was advised of his Miranda Rights. Defendant acknowledged his rights and elected to answer questions without an attorney present. Defendant admitted knowledge of the undocumented aliens concealed in the trunk of the vehicle. Defendant admitted he was to receive $100.00 (USD) for the smuggling act. Defendant stated he was to drive the vehicle to a gas station on Palomar Street in Chula Vista, California.

During separate videotaped interviews, Material Witnesses admitted they are citizens of Mexico without documents to enter or reside in the United States. MW1 stated he made arrangements for himself, MW2 and MW3 to be smuggled into the United States. Material Witnesses stated they were pay $3,800.00 (USD) to be smuggled into the United States. Material Witnesses admitted they were going to Los Angeles, California.